Mr. Tris Gour
AMPCOR II, Inc.
P.O. Box 87
LaPorte, Indiana 46352

Re: 091-12370-00052
First Significant Permit Modification to
Part 70 - 091-7804-00052

Dear Mr. Gour:

AMPCOR II, Inc. was issued a Part 70 permit on February 9, 1999 for casket hardware manufacturing plant. An application to modify the source was received on March 24, 2000. This source modification is incorporated as a Significant Modification to the Part 70 permit. Pursuant to the provisions of 2-7-12(b) the permit is hereby modified as follows:

The significant permit modification consists of incorporating the new operation conditions under the Minor Source Modification for the proposed new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), and the one (1) permitted electrostatic rotating disk paint system, identified as CC.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for (Aida De Guzman) or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD
cc: File -LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Ampcor II, Inc.
105 Koomler Drive,
LaPorte, Indiana 46350

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7804-00052	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 9, 1999
1st Significant Permit Modification No.: 091-12370-00052	Pages Affected: 5, 29, 30, 31, 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation that manufactures casket hardware.

Responsible Official:	David R. Christian
Source Address:	105 Koomler Drive, LaPorte, Indiana 46350
Mailing Address:	PO Box 87, LaPorte, Indiana 46352-0087
SIC Code:	3471, 3462, 3089
County Location:	LaPorte
County Status:	Nonattainment for SO_2
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

(2) One (1) spray booth, with one (1) HVLP spray gun, used for clear coating of zinc and steel parts, identified as ASG1, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control and exhausting to one (1) stack, identified as ASGX.

(3) One (1) spray booth, used for parts washing, identified as WSH1, where parts are dipped into a 55 gallon drum of solvent, with a maximum capacity to wash 4.48 pounds of painted parts per hour, with emissions uncontrolled, exhausting to one (1) stack, identified as WSHX1.

(4) One (1) spray booth, consisting of a parts washing station, identified as WSH2, where parts are dipped into a 55 gallon drum of solvent, with a maximum capacity of 4.48 pounds of painted parts washed per hour, and one (1) HVLP spray gun, identified as ASG2, used on occasion for shading, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control, and exhausting to one (1) stack, identified as WSHX2.

(5) One (1) flowcoater, identified as KFC, located in the Kriterion Plastics Department, with a maximum capacity to coat 1500 units per hour, using dry filters for particulate matter control and exhausting to two (2) stacks, identified as KFCX1 and KFCX2, respectively.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b) to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IA. 8-2-9]

(a) Pursuant to 326 IA. 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to CC shall be limited as follows:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Air Dried Coat	3.5
Forced Warm Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the electrostatic rotating disk paint system, CC, and the facilities listed in D.2.1 and D.3.1 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IA. 2-7-6(1),(6)][326 IA. 2-1.1-11]

(a) Compliance stack tests shall be performed on the thermal oxidizer to determine the operating temperature that will achieve its destruction efficiency and the capture system efficiency of the electrostatic rotating disk paint system, identified as CC . The determination of these operating parameters shall verify the overall control system of 88%.

(b) The Compliance stack tests for (a) of this condition shall be made utilizing Method 204 for capture efficiency and Method 25 for destruction efficiency, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days of the issuance of this 1st Significant Permit Modification (091-12370-00052).

D.1.5 Thermal Oxidizer

(a) The thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1350 ^{0}F during operation until a temperature and fan amperage has been determined from the most recent compliance stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 88% based on the stack capture and destruction efficiency.

(b) When operating the thermal oxidizer to achieve compliance with 326 IA. 8-2-9, (4.3 when using clear coating, 3.5 when using extreme performance coating, or 3.0 for all other coatings) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain an overall control efficiency of 88%. This control efficiency and the use of the thermal oxidizer are required by rule 326 IA. 8-1-2(a)(2).

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the electrostatic rotating disk paint system, CC, is in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack AA, while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.9 Thermal Oxidizer Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained at a range established in the most recent compliance stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(c) To document compliance with Conditions D.1.2 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	AMPCOR II, Inc.	
Source Location:	105 Koomler Drive, LaPorte, Indiana 46350	
County:	LaPorte	
SIC Code:	3471, 3462, 3089	
Operation Permit No.:	T091-7804-00052	Issuance Date: February 9, 1999
Significant Permit Modification No.:	091-12370-00052	
Permit Reviewer:	Aida De Guzman	

The Office of Air Management (OAM) has reviewed a minor permit modification application from AMPCOR II, Inc. for the operation of the following equipment:

(a) One (1) new thermal oxidizer, with a heat input rate of 3.5 million British Thermal Units per hour (mmBtu/hr), to control the VOC emissions from the one (1) permitted electrostatic rotating disk paint system, identified as CC, with a maximum capacity to paint 1500 units per hour, using dry filters for particulate matter control.

This control equipment will be installed in order for the source to meet the compliance schedule stated in Condition D.1.4(b), to comply with the VOC limits in condition D.1.1 of the issued Part 70 permit T091-7804-00052 required in rule 326 IAC 8-2-9.

History

AMPCOR II, Inc. was issued a Part 70 (T091-7804-00052) on February 9, 1999. On March 24, 2000, AMPCOR II, Inc. submitted an application to the OAM for the construction of the above thermal oxidizer, which is to be permitted under Minor Source Modification 091-12087-00052. This source will be issued a corresponding significant permit modification under rule 326 IAC 2-7-12(d), because there are new monitoring terms and conditions associated with the oxidizer installation, which do not qualify as an administrative amendment or a minor permit modification.

For information related to the rules requirements and other source information, please refer to the associated minor source modification.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A permit application for the purposes of this review was received on March 24, 2000. Additional information via e-mail was received on April 25, 2000, via fax on May 25, 2000, and June 22, 2000.

Conclusion

The operation of this casket hardware manufacturing shall be subject to the conditions of the attached proposed **Significant Permit Modification No. 091-12370-00052.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Significant Part 70 Operating Permit Modification

Source Name:	AMPCOR II, Inc.
Source Location:	105 Koomler Drive, LaPorte, Indiana 46350
County:	LaPorte
SIC Code:	3471, 3462, 3089
1st Significant Permit Modification No.:	091-12370-00052
Permit Reviewer:	Aida De Guzman

On July 19, 2000 the Office of Air Management (OAM) had a notice published in the LaPorte Herald-Argus, LaPorte, Indiana, stating that AMPCOR II, Inc. had applied for a minor modification to the source. This modification is incorporated in the Part 70 Operating Permit as a Significant Permit Modification. The notice also stated that OAM proposed to issue a permit for this modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 16, 2000, AMPCOR II, Inc. has submitted comments on the proposed permit modification. The summary of the comments and corresponding responses is as follows (changes are bolded, and deletion are struck through for emphasis):

Comment 1: Condition D.1.4(c) of the proposed permit which states :

> (c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days after achieving maximum production rate, but no later than 180 days after the installation of the thermal oxidizer.
>
> Be modified to state:
>
> (c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days of the issuance of this 1st Significant Permit Modification (091-12370-00052).

Response 1: Operation Condition No. D.1.4 will be changed as the source proposed:

> (c) The compliance tests required in (a) and (b) of this condition shall be made within 60 days ~~after achieving maximum production rate, but no later than 180 days after the installation of the thermal oxidizer~~ **of the issuance of this 1st Significant Permit Modification (091-12370-00052)**.